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CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

9
10 Attorneys for Plaintiff
11 United States of America

12 IN THE UNITED STATES DISTRICT COURT
13
14 EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

16 CASE NO. 1:20-cr-00219-NONE-SKO

17 Plaintiff,

18 U.S.C. § 2422(b) – Attempted Coercion and
19 Enticement of a Minor; 18 U.S.C. § 1470 -- Transfer
20 of Obscene Material to a Minor; 18 U.S.C. §§ 1467(a)
21 and 2428(b) – Criminal Forfeiture

v.

22 MICHAEL DICKENS,

23 Defendant.

24
25
26
27
28 I N D I C T M E N T

29 COUNT ONE: [18 U.S.C. § 2422(b) – Attempted Coercion and Enticement of a Minor]

30 The Grand Jury charges: T H A T

31 MICHAEL DICKENS,

32 defendant herein, beginning on or about October 21, 2020, and continuing through on or about October
33 30, 2020, in the County of Fresno, State and Eastern District of California, and elsewhere, using
34 facilities and means of interstate and foreign commerce, did knowingly attempt to persuade, induce,
35 entice, and coerce an individual who he believed had not attained the age of 18 years to engage in sexual
36 activity for which any person could be charged with a criminal offense, all in violation of Title 18,
37 United States Code, Section 2422(b).

1 COUNT TWO: [18 U.S.C. § 1470 – Attempted Transfer of Obscene Material to a Minor]

2 The Grand Jury further charges: T H A T

3 MICHAEL DICKENS,

4 defendant herein, beginning on or about October 21, 2020, and continuing through on or about October
5 30, 2020, in the County of Fresno, State and Eastern District of California, and elsewhere, using any
6 facility and means of interstate and foreign commerce, did knowingly transfer obscene matter to another
7 individual who he believed had not attained the age of 16 years, and attempted to do so, all in violation
8 of Title 18, United States Code, Section 1470.

9 FORFEITURE ALLEGATION: [18 U.S.C. §§ 1467(a) and 2428(b) – Criminal Forfeiture]

10
11 1. Upon conviction of the offense alleged in Count One of this Indictment, defendant
12 MICHAEL DICKENS shall forfeit to the United States pursuant to 18 U.S.C. § 2428(b), any property,
13 real or personal, that was used or intended to be used to commit or to facilitate the commission of such
14 violations, and any property, real or personal, constituting or derived from proceeds traceable to said
15 violations.

16
17 2. Upon conviction of the offense alleged in Count Two of this Indictment, defendant
18 MICHAEL DICKENS shall forfeit to the United States pursuant to 18 U.S.C. § 1467(a), any obscene
19 material produced, transported, mailed, shipped, or received in violation of this count, any property, real
20 or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and,
21 any property, real or personal, used or intended to be used to commit or to promote the commission of
such offense.

22
23 3. If any property subject to forfeiture as a result of the offenses alleged in Counts One
and Two of this Indictment, for which defendant is convicted:

24
25 a. cannot be located upon the exercise of due diligence;
26 b. has been transferred or sold to, or deposited with, a third party;
27 c. has been placed beyond the jurisdiction of the Court;
28 d. has been substantially diminished in value; or
e. has been commingled with other property which cannot be divided without

1 difficulty;

2 it is the intent of the United States, pursuant to 18 U.S.C. §§ 1467(b), 2253(b), and 28 U.S.C.
3 § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of said
4 defendant, up to the value of the property subject to forfeiture.

5
6
7 A TRUE BILL.

8 */s/ Signature on file w/AUSA*

9

FOREPERSON

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11
12 MCGREGOR W. SCOTT

13 United States Attorney

14 **KIRK E. SHERIFF**

15 KIRK E. SHERIFF

16 Assistant United States Attorney

17 Chief, Fresno Office